




FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: The Commission
Staff Director
General Counsel
FEC Press Office
FEC Public Disclosure

FROM: Office of the Commission Secretary 

DATE: November 29, 2011

SUBJECT: Comments on Draft AO 2011-23 (#1)
(American Crossroads)

Transmitted herewith are six timely submitted comments regarding the above-captioned matter. The comments are from D J Wilson, Eunice Kimm, Pat Allen, Candy Luck, Matthew Klope, and Ahmad H. Ibrahim.

Draft Advisory Opinion 2011-23 is scheduled for the open meeting agenda of December 1, 2011.

Attachments



"DJ Wilson"
<seahag9@verizon.net>
11/25/2011 10:36 AM

To <Secretary@FEC.gov>
cc
bcc
Subject Comment on AOR 2011-23

Good Morning Sir/Ma'am,

I am writing to express my concern regarding the above referenced query. I oppose any change in FEC rules that would allow (or refuse to prevent) direct support of individual candidates by political action committees (PACs), or "super-PACs". I strongly believe that any particular audio/visual reference to a preferred candidate, or specific audio/visual reference to an opposed candidate, would violate the intent of the law.

Sincerely,
Dawna J. Wilson
Virginia Beach, VA



"Eunice Kimm"
<kim.me@netzero.net>
11/25/2011 12:42 PM

To <Secretary@FEC.gov>
cc
bcc
Subject AOR 2011-23

Perhaps it is too late to send a comment on this request. If not, here is my comment. I do not see how an advertisement "to improve the public's perception of the featured Member of Congress in advance of the 2012 campaign season" differs from campaigning for a particular candidate, which I understand is illegal. Please do not grant this request.
Thank you.

Eunice Kimm
one of "the American people"
or, perhaps more currently stated,
one of the 99%



"Pat Allen"
<jacqu88@centurytel.net>
11/25/2011 03:46 PM

To <Secretary@FEC.gov>
cc
bcc
Subject The Corporate Takeover of the United States

Why are you allowing Karl Rove to run this nation?

Patricia B. Allen
161st ST
Chippewa Falls, WI 54729

http://www.progressive.org/republican_takeover_alc.html



candy luck
<candy.luck@ymail.com>

11/25/2011 09:39 PM

Please respond to
candy luck
<candy.luck@ymail.com>

To "Secretary@FEC.gov" <Secretary@FEC.gov>

cc

bcc

Subject AOR 2011-23

Please attach to : Karl Rove's Opinion Request (which is AOR 2011-23)

As a member of Americans for a Better Tomorrow, Tomorrow, I believe it would be in the best interest of this Super Pac if you would grant the request to Karl Rove's Super Pac American Crossroads stating 'that while their advertisements would be fully coordinated with incumbent Members of Congress facing re-election in 2012, they would presumably not qualify as coordinated communicate.'

This would afford Stephen Colbert the same rights. And 'If the commission does not see fit to grant this request fully, Americans for a Better Tomorrow, Tomorrow would like to offer a compromise. To avoid the appearance of collusion, the F.E.C. could rule that candidates can appear in Super PAC ads only against their will. They'd have to be kidnapped, blindfolded, and thrown in a van before being forced to read a statement supporting their goals and then returned to their fundraisers in time for dessert.'

Enjoy!

Candy Luck



Matthew Klope
<mklope27@gmail.com>
11/28/2011 12:14 AM

To Secretary@FEC.gov
cc
bcc
Subject Karl Rove's Advisory Opinion Request

Dear Secretary Werth:

I am writing concerning Karl Rove's Advisory Opinion Request for his PAC "American Crossroads" (AOR 2011-23). As a voting American Citizen, I have an interest in Rove's request for his PAC. I say, what's the danger of letting Rove get unlimited, untraceable money that he can then pass on to candidates? After all, money never corrupted anyone! Besides, the way I see it we don't have enough corporations in politics these days. Why can't it be like back in the early 1900's when big name companies got to decide whether Mr and Mrs Martinez got to vote? Those were the days. These days, everyone's all crazy about "individual rights" and "politicians who don't represent corporate interests." Well you know who we're forgetting here? Corporations. They're people too. And they have some of the lowest voting numbers in the country (besides Mexicans).

Besides, funding ads where candidates talk about issues concerning their campaigns is not collaborating with the candidate. Think of it as a political "glory hole." Rove isn't quite sure who's on the other side, but he does know that they're all over his Ham. And the American people gets to watch the whole thing. Just Rove, a candidate, and a whole lot of Ham. By the way, you might want to pass this idea off to Rove for one of his ads.

So let him do it, FEC. Because I don't want my children to grow up in a world where politicians are fueled by corporations. I want them to grow up in a world where corporations anonymously fuel super PACs who use that money to make "issue ads" with candidates which aren't collaboration but have a mild campaign message and by the end of the whole mess nobody's sure whose ham they're rubbing, and maybe by this point my children will be so hopelessly confused that they'll be quiet for a few minutes and I can FINALLY GET SOME SLEEP.

Because if there's anything more American than money laundering, I'd like to see it.

Sincerely,
Matthew T Klope

Americans For A Better Tomorrow, Tomorrow

November 6, 2011

Shawn Woodhead Werth
Secretary and Clerk
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Comment on American Crossroads Advisory Opinion Request

Dear Secretary Werth:

Americans for a Better Tomorrow, Tomorrow submits this letter as a formal comment on the Advisory Opinion Request submitted to the Federal Election Commission on October 12, 2011, and again in a revised version on October 28, 2011 by American Crnssrnads, an organization led by Republican political consultant and "Mr. November" in the 2012 "Hooks of the Bush Administration" calendar, Karl Rove.

Americans for a Better Tomorrow, Tomorrow has much in common with American Crossroads. Both are registered "independent-expenditure-only" PACs (a.k.a. "Super PACs") that may accept unlimited contributions from corporations, unions, individuals, and doomsday cults we one day hope to found. Both groups are separately affiliated with prominent 501(c)(4) organizations, Colbert Super PAC SHH and Crossroads GPS, and are strongly committed to doing what is legally possible in America. Both have top strategic thinkers at their core: American Crossroads has Karl Rove, and Americans for a Better Tomorrow, Tomorrow has a ham loaf wearing wire rimmed glasses.

Because of this shared bond and heritage, Americans for a Better Tomorrow, Tomorrow has an interest in the Request by American Crossroads.

As we understand the American Crossroads Advisory opinion Request, the organization has plans to sponsor advertisements featuring Members of Congress up for re-election. As they wrote in their original Request,

"The purpose of these advertisements, while focused on current legislative and policy issues, would be to improve the public's perception of the featured Member of Congress in advance of the 2012 campaign season."

Americans for a Better Tomorrow, Tomorrow could not concur more concurrently. These ads would simply improve public perception of candidates in advance of the campaign. The message is not, "Vote for this great guy," it's merely, "Hey voters! Look at this great guy!"

Clearly, these ads featuring candidates on behalf of candidates would not be candidate ads. As American Crossroads put it, in their original Request,

"While these advertisements would be fully coordinated with incumbent Members of Congress facing re-election in 2012, they would presumably not qualify as 'coordinated communications.'"

Americans for a Better Tomorrow, Tomorrow agrees that "fully coordinated" ads shouldn't be counted as "coordinated communications." The candidate would merely be appearing as a paid spokesperson, who, coincidentally, is closely aligned with the candidate that he or she also is.

For example, an ad in which the Kool Aid man decries our nation-wide childhood thirst problem would not necessarily be an ad for Kool Aid brand juice drink. That being said, would a tall glass of Kool-Aid solve that thirst problem? To quote one expert: "Oh, yeaahhhh!"

Americans for a Better Tomorrow, Tomorrow wholly endorses American Crossroads' Request. We hope the Commission is able to begin with the Supreme Court's definition of Non-Coordinated as "expenditures ... made totally independently of the candidate and his campaign" in *Buckley v. Valeo*, and end up with a ruling that allows outside groups to produce ads with the candidate's cooperation, themes, and message. That will prove to our nation's critics that America is a country that still makes something: strained rationalizations.

Americans for a Better Tomorrow, Tomorrow believes that Super PACs can and should coordinate with candidates in every sense of that word—except in the legal or biblical sense. In fact, pending the outcome of American Crossroads' Request, Americans for a Better Tomorrow, Tomorrow plans to coordinate a non-"coordinated" ad with presidential novelty candidate Buddy Roemer. A rough example of which can be found here: www.colbertsuperpac.com/unfettered-non-coordination.

It should be clear that there was no collusion with Governor Roemer, as he vehemently opposes and passionately questions the legality of the ad that he agreed to appear in.

If the Commission sees fit to grant these reasonable requests, Americans for a Better Tomorrow will continue to fulfill our promise to never give you up, or let you down, as detailed in our mission statement here:

<http://youtu.be/d6lw4w9WgXcQ>

Accordingly, Americans for a Better Tomorrow, Tomorrow respectfully requests the Commission's timely consideration of American Crossroads' Advisory Opinion Request.

Super Sincerely Yours,

Ahmad H. Ibrahim
Software Developer & American Citizen

Stephen Colbert
President & Maître D'
Americans for a Better Tomorrow, Tomorrow, Inc.

Ham Rove
Chief Strategist & Lunchmeat
Americans for A Better Tomorrow, Tomorrow, Inc.